



highly proprietary information and source code relating to the www.amazon.com website, its design, development, and operation are stored at or accessible from Amazon's Seattle headquarters. The same is true for nearly all of the information related to Amazon's general operations, marketing, financials, and customer service.

4. The vast majority of Amazon employees knowledgeable about the design, development, and operation of the www.amazon.com website are located at Amazon's Seattle headquarters.

5. Amazon owns subsidiaries Amazon Web Services LLC and VADATA, Inc., which, themselves or through their subsidiaries, own and operate data centers located throughout the United States, including in Washington and Virginia. Amazon or its subsidiaries also own distribution facilities located in numerous states across the country, including Washington and Virginia. But all of Amazon's documentation and personnel relevant to this litigation, in view of the allegations in the complaint, are located in or accessible from Amazon's headquarters in Seattle.

6. Amazon Web Services LLC and VADATA, Inc. personnel are not responsible for the design or development of the www.amazon.com website. Rather, personnel with those responsibilities are located at Amazon in Seattle.

7. A number of former employees of Amazon who may have information relevant to this lawsuit, in view of the allegations in the complaint, and who are no longer within Amazon's control, reside within 100 miles of the Western District of Washington Courthouse at 700 Stewart St., Suite 2310, Seattle, WA 98101.

8. At least seven former Amazon employees that were involved in the design or development of Amazon's Lightning Deals and/or Gold Box Deals features during their

employment had a last known address in the Seattle area, within 100 miles of the Western District of Washington.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Seattle, Washington on this 23rd day of August, 2013.



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Jeffrey H. Dean